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Attorneys for Plaintiff  
Amy Patterson

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF ARIZONA**

AMY PATTERSON,  
Plaintiff/Counterdefendants,  
  
vs.  
  
TWO FINGERS, LLC, et al,  
Defendants/Counterclaimants.

Case No: 2:15-cv-00494-NVW

**MOTION FOR WITHDRAWAL  
AND SUBSTITUTION OF  
PLAINTIFF'S COUNSEL *WITH  
CLIENT CONSENT***

Motion is made as follows: (1) Plaintiff Amy Patterson's counsel Peter K. Strojnik and The Strojnik Firm LLC hereby withdraw as her counsel in the above captioned matter *with Plaintiff's consent*, and (2) Plaintiff's current counsel is being substituted with Peter Strojnik of the law firm of Strojnik P.C., who is currently acting as special counsel for counterdefendants. This withdrawal and substitution is made pursuant to LR Civ. 83.3(b).

The undersigned withdraws from this representation because Defendants have undertaken a strategy to focus this Court on matters collateral to the substantive issues in this case, that is, Ms. Patterson's Title VII sexual harassment and sexual assault allegations against Defendant Popo and his three restaurants. With the undersigned's withdrawal, the undersigned is hopeful that Defendants' strategy can be nipped in the bloom and the proper focus of this case can be on a female victim of sexual harassment and assault.

1 The undersigned withdraws from this representation also because he may have  
 2 substantial information that would benefit Plaintiff in this prosecution. The undersigned  
 3 has been threatened and intimidated by Defendants' counsel as well as others  
 4 apparently acting on their behalf. The undersigned will be able to testify about the  
 5 physical threats levied against the undersigned's vendors, the physical and occupational  
 6 intimidation that has been made toward witnesses, and Defendants' counsels' threats of  
 7 "multiple bar complaints" in the context of the undersigned speaking with former  
 8 employees of Defendant restaurants. The undersigned will also be able to testify about  
 9 current governmental investigations currently being undertaken against Defendants, as  
 10 well as Defendants' and Defendants' counsels' misrepresentations to Plaintiff in the  
 11 context of settlement concerning which restaurant(s) is/are insured, the limit of the  
 12 policy(ies), and the nature of the policy(ies).<sup>1</sup>

13 In sum, the undersigned may be more valuable to the client as a witness rather  
 14 than as counsel, especially since the undersigned is being replaced with an attorney who  
 15 has almost as many years of experience practicing law than the undersigned has been  
 16 living. The undersigned's potential monetary gain from representation is outweighed by  
 17 the benefit to Ms. Patterson.

18 The undersigned certifies that despite his withdrawal, he will still abide by his  
 19 promise to the Court to not re-open any social media or any publications relating to or  
 20 concerning this litigation, unless the Court later permits such expression to Plaintiff  
 21 directly.

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 24 <sup>1</sup> In a deceptive set of events, Defendants' counsel Jason Mullis and Counterclaimants'  
 25 counsel Eddie Pantiliat have represented to Plaintiff different insurance policy(ies),  
 26 different policy limits, and different nature of policy(ies) in the context of settlement. In  
 27 an unprecedented occurrence, ***Defendants' insurer claims adjuster called the***  
 28 ***undersigned and left a voicemail***. The undersigned did not return the call because  
 Defendants' counsel did not permit it, which came at a time when Plaintiff questioned  
 whether Defendants' counsel was intentionally misrepresenting the nature of the  
 insurance policy(ies), the policy limits, and who exactly the insured(s) is/are, during  
 settlement negotiations.

1 The undersigned certifies, and Plaintiff consents with her signature below under  
2 the heading "Client Consent", that Plaintiff consents to this withdrawal and substitution.  
3 The undersigned certifies that Plaintiff is aware of all current deadlines and is being  
4 forwarded a copy of this Notice.

5 New Plaintiff's counsel, not to be confused with the undersigned Peter K.  
6 Strojnik, Peter Strojnik's contact information is stated below:

7 **Peter Strojnik, Esq.**  
8 **Strojnik P.C.**  
9 **2415 East Camelback Road, Suite 700**  
10 **Phoenix, Arizona 85016**  
11 **602-524-6602 (tel)**  
12 **602-296-0153 (fax)**  
13 **[ps@strojnik.com](mailto:ps@strojnik.com) (e-mail)**

14 New counsel requests to be added to the ECF mailing list at [ps@strojnik.com](mailto:ps@strojnik.com), as  
15 he is not currently receiving notices despite acting as special counsel. Pursuant to LR  
16 Civ 83.3(b), a proposed form of Order is attached and will be sent to the Court's  
17 chambers in MS Word.

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RESPECTFULLY SUBMITTED this 1<sup>st</sup> day of May, 2015.

THE STROJNIK FIRM LLC

By /s/ Peter K. Strojnik  
Peter K. Strojnik (026082)  
2415 East Camelback Road, Suite 700  
Phoenix, Arizona 85016  
Attorneys for Plaintiff

STROJNIK PC

By /s/ Peter Strojnik  
Peter Strojnik (6464)  
2415 East Camelback Road, Suite 700  
Phoenix, Arizona 85016  
Attorneys for Plaintiff

**CLIENT CONSENT**

I, Amy Patterson, am the named Plaintiff in the above cause of action. My current counsel as Plaintiff is Peter K. Strojnik. I consent to his withdrawal as my counsel as Plaintiff, and I further consent to Peter Strojnik to substitute in as my counsel as Plaintiff.

DATED this 1<sup>st</sup> day of May, 2015.

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Amy Patterson